

**Van Horn, Kristen, NMENV**

From: Van Horn, Kristen, NMENV
Sent: Wednesday, April 08, 2009 1:53 PM
To: 'brucew@lanl.gov'; 'Ron Rager'
Cc: Roberts, Kathryn, NMENV; Cobrain, Dave, NMENV; Bearzi, James, NMENV
Subject: NMED Comments on Draft Phase III WP MDA T

Comments on Draft Phase III Work Plan MDA T**General Comments:**

- 1) Need to provide start dates (at least estimates) for drilling each of the wells (in calendar days).
- 2) Need to present a schedule for submitting quarterly vapor monitoring reports.

Specific Comments:

- 1) "Primary Purpose" Section : NMED will require the proposed new vapor well near North Perimeter Road be drilled to at least 950 feet or to the water table.
- 2) "Rationale" Section:
 - a) To allow for data comparison, the Permittees must ensure that sampling ports in the proposed vapor monitoring wells are placed at the same depth intervals as those in 21-603058 (70, 163, 219.5, 245, 342 ft bgs) and 21-25264 (70, 153, 225, 326, 352) (proposed depths are: 79, 114, 189, 234, 290, 375, 475, 575, 675) in addition to the deeper ports.
 - b) NMED concurs that the vapor well proposed near Building 21-257 may be drilled once data from DP Aggregate Industrial Waste Line investigation activities are complete. However, the Permittees must provide a rationale in the Phase III Work Plan for why this well can't be completed now.
 - c) The Permittees may not abandon well 21-25263.
 - d) NMED will require vapor sampling upon well completion rather than waiting 3 months to sample wells. The wells can be purged appropriately to collect samples within fourteen days of well installation.
- 3) "Hydrogeotechnical and Geochemical Objectives" Section:
 - a) The Permittees need to describe how the boreholes will be logged in accordance with Section IX.B.2.c of the Order.
 - b) The Permittees must provide the rationale behind the analytical suites (i.e. based on previous sampling).
 - c) In addition to tritium sampling, sampling for additional radionuclides should be proposed (based on previous sampling).
- 4) "Field Methods" Section: The Permittees need to discuss well construction methods and materials in greater detail.



If you have any questions or concerns, please feel free to contact me.

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